

EXHIBIT C



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May 20, 2021

VIA EMAIL ONLY

David Cross, Esq.
Lyle F. Hedgecock, Esq.
Morrison & Foerster LLP
2000 Pennsylvania Avenue, NW
Washington, DC 20006-1888

Re: *Donna Curling, et al. v. Brad Raffensperger, et al.*, No. 1:17-cv-2989-AT
Search Terms and Other Discovery Issues

Dear David:

This letter is our response on search terms that were promised in our May 14, 2021 letter and several additional discovery issues. Now that Judge Totenberg has put us on a schedule, we look forward to working cooperatively together on the discovery process.

SEARCH TERMS

We propose using the following terms to capture documents that may be responsive to your requests for production:

- (election AND (review* OR analy* OR examin* OR evaluat* OR study)) AND (error! OR malfunction! OR broke* OR break* OR discrepant* OR glitch! OR "switch* votes" OR provisional OR "express poll" OR "poll pad" OR (incorrect OR wrong))
- ("Center for Elections Systems" OR Kennesaw OR server*) AND (wipe* OR destroy* OR repurpos*)
- (pollbook OR "poll book" OR e-poll*)
- (express OR "check-in" OR "check in" OR "checkin" OR "certificate*" OR "ID card*" OR "smart card*")
- (secur! /10 (breach* OR assess*))
- (secur! /5 vulner*)
- (audit AND (process* OR data* OR result*))
- ("voting machine*" OR DRE OR DREs OR "direct recording" OR BMD OR BMDs)

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- (“voting machine*” AND Dominion AND (fail* OR error! OR malfunction! OR broke* OR break* OR glitch!))
- (“Poll Pad*” AND KnowInk AND (fail* OR error! OR malfunction! OR broke* OR break* OR glitch!))
- (“machine*” OR DRE OR DREs OR “direct recording” OR BMD OR Dominion OR touchscreen) /5 (error! OR malfunction! OR broke* OR break* OR discrepant* OR glitch! OR “switch* votes” OR president*)
- ((complain* OR violat* OR report*) w/10 (candidate OR elect* OR primar* OR ballot OR vot* OR precinct OR poll OR count or machine OR superintendent OR registrar OR missing))
- (transfer AND (media OR air-gap OR airgap OR server OR data OR USB OR thumb*))

Per our prior letters, these terms will be run against the following custodians’ Exchange mailboxes:

1. Brad Raffensperger
2. Ryan Germany
3. Chris Harvey
4. Merritt Beaver
5. Michael Barnes
6. Blake Evans
7. Kevin Rayburn
8. Jordan Fuchs
9. David Hamilton

We developed these terms by modifying other terms used in prior litigation filed against the State of Georgia involving allegations that voting machines were hacked and not functioning properly. Our opposing counsel in that case accepted the terms as comprehensive. We believe they will adequately capture documents that may be responsive to Plaintiffs’ requests for production.

Please let us know as soon as possible whether you agree to the use of these terms and we will commence the search process with a goal of producing nonprivileged responsive documents as quickly as possible.

COMMUNICATIONS MOVING FORWARD

In the interest of ensuring all counsel of record and relevant staff are included on communications involving this case, please use this list for State Defendants of individuals who should be copied on all electronic communications:

Vincent Russo, vrusso@robbinsfirm.com

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Josh Belinfante, jbelinfante@robbinsfirm.com
Carey Miller, cmiller@robbinsfirm.com
Alexander Denton, adenton@robbinsfirm.com
Melanie Johnson, mjohnson@robbinsfirm.com
Javier Pico-Prats, javier.picoprats@robbinsfirm.com
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Loree Anne Paradise, lparadise@taylorenghish.com
Rashmi Ahuja, rahuja@taylorenghish.com
Drina Miller, dmiller@taylorenghish.com

If you will provide us with a similar list, we will ensure that all of the relevant individuals are included on electronic communications.

DATES FOR PLAINTIFF DEPOSITIONS

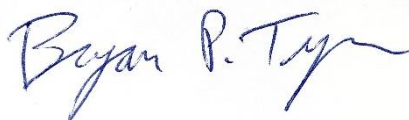
We plan to take the depositions of your clients as soon as they can be scheduled. Please provide dates for the depositions of the following individuals:

1. Donna Curling
2. Donna Price
3. Jeffrey Schoenberg

MEET AND CONFER

Finally, in our most recent letter, we asked for your position on several interrogatories and requests for production. Please let us know by Monday, May 24 whether you will stand on your objections or whether we need to meet and confer. If we need to meet, please provide some dates and times that work for your team.

Sincerely,

A handwritten signature in blue ink that reads "Bryan P. Tyson". The signature is fluid and cursive, with the first name "Bryan" being the most prominent.

Bryan P. Tyson
For TAYLOR ENGLISH DUMA LLP

cc: All counsel of record (by email)